

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

AMERICAN INTERNATIONAL GROUP,	)	
INC., et al.,	)	
	)	
Plaintiffs,	)	No. 07 CV 2898
vs.	)	
	)	District Judge Robert W. Gettleman
ACE INA HOLDINGS, INC., et al.,	)	
	)	Magistrate Judge Sidney I. Schenkier
Defendants.	)	

SAFECO INSURANCE COMPANY OF	)	
AMERICA, et al., individually and on behalf	)	
of a class consisting of members of the	)	
National Workers Compensation Reinsurance	)	No. 09 CV 2026
Pool,	)	
	)	District Judge Robert W. Gettleman
Plaintiffs,	)	
vs.	)	Magistrate Judge Sidney I. Schenkier
	)	
AMERICAN INTERNATIONAL GROUP,	)	
INC., et al.,	)	
	)	
Defendants.	)	

**NOTICE OF FILING**

TO: All Parties of Record (ECF Filing)

PLEASE TAKE NOTICE that on August 4, 2011, we filed with the United States District Court for the Northern District of Illinois the fully executed **FIRST AMENDMENT TO SETTLEMENT AGREEMENT** (reflecting NCCI's signature as well as the signatures which appeared on the July 28, 2011 filing), a copy of which is attached hereto.

DATED: August 4, 2011

Respectfully submitted,

ACE INA HOLDINGS, INC., AUTO-  
OWNERS INSURANCE CO., COMPANION  
PROPERTY & CASUALTY INS. CO.,  
FIRSTCOMP INSURANCE CO., THE  
HARTFORD FINANCIAL SERVICES  
GROUP, INC., TECHNOLOGY INSURANCE  
CO., and THE TRAVELERS INDEMNITY  
COMPANY

By /s/ Frederic R. Klein  
One of Their Attorneys

Frederic R. Klein  
William C. Meyers  
Kerry D. Nelson  
Nury R. Agudo  
GOLDBERG KOHN LTD.  
55 East Monroe Street, Suite 3300  
Chicago, IL 60603  
(312) 201-4000

AMERICAN INTERNATIONAL GROUP,  
INC., et al.,

By /s/ Stephen Novack  
One of Their Attorneys

Stephen Novack  
Andrew D. Campbell  
Rebekah H. Parker  
NOVACK AND MACEY LLP  
100 North Riverside Plaza  
Chicago, IL 60606  
(312) 419-6900

Michael B. Carlinsky  
Kevin S. Reed  
Jennifer J. Barrett  
QUINN EMANUEL URQUHART  
& SULLIVAN, LLP  
51 Madison Avenue  
22nd Floor  
New York, NY 10010  
(212) 849-7000

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on August 4, 2011, he caused a true and correct copy of the fully executed **FIRST AMENDMENT TO SETTLEMENT AGREEMENT** to be served upon the parties of record via the Court's ECF/electronic mailing system.

/s/ Frederic R. Klein

**FIRST AMENDMENT TO SETTLEMENT AGREEMENT**

WHEREAS, the undersigned parties executed a Settlement Agreement dated January 28, 2011 (the "Original Settlement Agreement"), filed with the United States District Court for the Northern District of Illinois as D.E. 332 in Case No. 09 CV 2026 (the "Case");

WHEREAS, all capitalized terms used herein but not defined shall have the meanings given to such terms in the Original Settlement Agreement;

WHEREAS, the undersigned parties have taken into account the remarks made by the Court during the June 21, 2011 and July 25, 2011 hearings in the Case;

WHEREAS, the undersigned parties wish to amend the Original Settlement Agreement as follows to address the Court's remarks made on June 21, 2011 and July 25, 2011, and to correct minor typographical errors;

WHEREAS, except as expressly stated herein, all other aspects of the Original Settlement Agreement remain in place and unchanged;

NOW, THEREFORE, IT IS HEREBY AGREED by the undersigned parties as follows:

1. Section I.A.23 is amended so that "bsut" is deleted and replaced by "but".
2. Section VI.A. is amended to delete the words "no later than fifteen (15) days", which are replaced by "no later than thirty (30) days".
3. Section VII.A is amended to delete the words "no later than fifteen (15) days", which are replaced by "no later than thirty (30) days".

4. Section VII.B is amended to delete the following words: "shall provide evidence of the objector's membership in the Settlement Class and".

5. Section VII.C is amended to delete the words "no later than fifteen (15) days", which are replaced by "no later than thirty (30) days".

6. Section VIII.A.1 is amended so that "NWCRP Releases" is deleted and replaced by "NWCRP Releasees".

Counterparts: This amendment may be signed in counterparts, each of which shall constitute a duplicate original. Execution by facsimile or by an electronically transmitted signature shall be fully and legally binding on a Settling Party.

Agreed to this 26<sup>th</sup> day of July, 2011

Brian E. Dowd / fork

Brian E. Dowd

President

*On Behalf of ACE INA Holdings, Inc.*

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Kenneth Schroeder

Senior Vice President

*On Behalf of Auto-Owners Insurance Co.*

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Jennifer Thorne

Chief Financial Officer

*On Behalf of Companion Property & Casualty Insurance Co.*

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Stephen Letak

Chief Financial Officer

*On Behalf of FirstComp Insurance Co.*

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Joseph M. Treacy

Assistant Vice President Workers Compensation Industry Affairs

*On Behalf of The Hartford Financial Services Group, Inc.*

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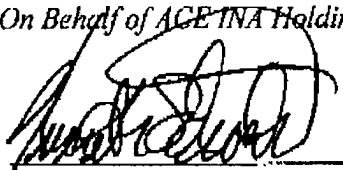
Stephen Ungar

General Counsel

*On Behalf of Technology Insurance Co.*

Agreed to this 25 day of July, 2011

\_\_\_\_\_  
Brian E. Dowd  
President  
*On Behalf of ACE TNA Holdings, Inc.*

  
\_\_\_\_\_  
Kenneth Schroeder  
Senior Vice President  
*On Behalf of Auto-Owners Insurance Co.*

\_\_\_\_\_  
Charles M. Potok  
President  
*On Behalf of Companlon Property & Casualty Insurance Co.*

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Stephen Letak  
Chief Financial Officer  
*On Behalf of FirstComp Insurance Co.*

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Joseph M. Treacy  
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*On Behalf of The Hartford Financial Services Group, Inc.*

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Stephen Ungar  
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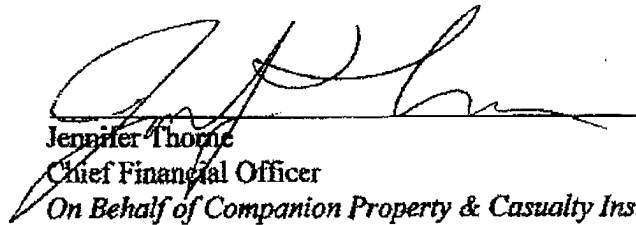
Agreed to this \_\_\_\_ day of \_\_\_\_\_, 2011

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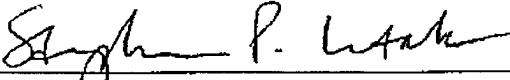
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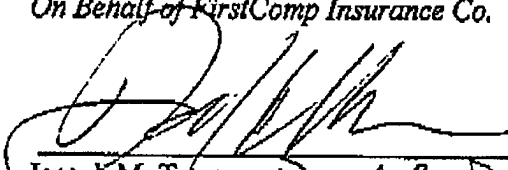
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\_\_\_\_\_  
Joseph M. Treacy ~~David C. Robinson~~  
~~Assistant Vice President Workers Compensation Industry Affairs~~ *Senior Vice President,*  
*On Behalf of The Hartford Financial Services Group, Inc.* *Director of Corporate Law*

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Stephen Ungar  
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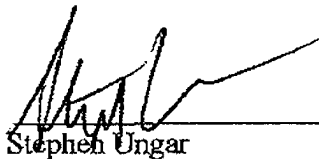
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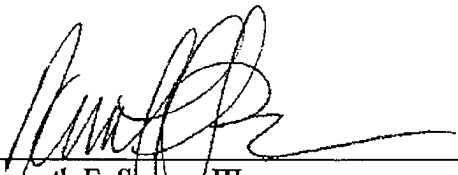
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Kenneth F. Spence III  
Executive Vice President, General Counsel  
*On Behalf of The Travelers Indemnity Company*

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Jeffrey A. Welikson  
Vice President, Corporate Secretary and Deputy General Counsel  
*On Behalf of American International Group, Inc.*

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Robert S. Schimek  
Executive Vice President  
*On Behalf of AIG Casualty Company f/k/a Birmingham Fire Insurance Company of Pennsylvania n/k/a Chartis Property Casualty Company; AIU Insurance Company; American Home Assurance Company; American International South Insurance Company f/k/a American Global Insurance Company n/k/a Chartis Casualty Company; American International Specialty Lines Insurance Company f/k/a Alaska Insurance Company n/k/a Chartis Specialty Insurance Company; Commerce and Industry Insurance Company; Granite State Insurance Company; Illinois National Insurance Co.; The Insurance Company of the State of Pennsylvania; National Union Fire Insurance Company of Pittsburgh, Pa.; and New Hampshire Insurance Company*

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Ronald Veltman  
Assistant Secretary  
*On Behalf of American International Pacific Insurance Company f/k/a American Fidelity Company n/k/a 21st Century Pacific Insurance company, and New Hampshire Indemnity Company n/k/a 21st Century Security Insurance Company*

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William Malphurs  
Chair of the Board of Governors  
*On Behalf of the National Workers Compensation Reinsurance Pool*

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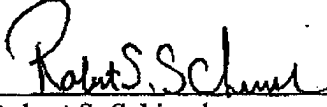
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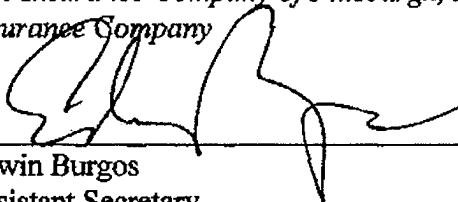
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Edwin Burgos  
Assistant Secretary

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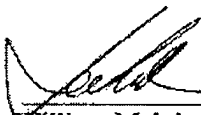
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*On Behalf of the National Workers Compensation Reinsurance Pool*





Terrence M. Delchanty  
General Counsel and Chief Legal Officer  
*On Behalf of National Council on Compensation Insurance, Inc.*